

O'Tormey, Sean P (FAA)

From: Reaves, David (FAA)
Sent: Friday, October 1, 2021 10:35 AM
To: grant.guillot@arlaw.com
Cc: O'Tormey, Sean P (FAA)
Subject: Request for Information - Draganfly, Inc. (Docket FAA-2021-0745) - response required by October 15, 2021

Mr. Grant J. Guillot, Agent for:
Mr. John Bagocius
Draganfly, Inc.
3910 RCA Boulevard, Suite 1015
Palm Beach Gardens, FL 33410 USA

Dear Mr. Bagocius:

The following information is required to continue processing the petition for exemption, Docket No. FAA-2021-0745, which you submitted on behalf of Draganfly Inc. We request you provide the following information to us no later than October 15, 2021:

1. Please provide a comprehensive flight operations and procedures manual. In your petition for exemption you state, "The relief requested is similar to relief previously granted for operations over 55 pounds in Exemption No. 18009, Powers Flight Group." In Exemption No. 18009, Powers Flight Group provided a flight operations and procedures manual as part of their risk mitigation strategy. Your flight operations and procedures manual should include flying procedures, pre-and post-flight procedures, and maintenance information.
2. Please provide a comprehensive training and certification program. In your petition, you state in Section IV, "Additionally, Petitioner is submitting the documents listed below on a confidential basis under separate cover, pursuant to 14 C.F.R. § 11.35(b):
 - 1) Petitioner's Drone Pilot Training Program and Checklists
 - 2) Petitioner's Training Outline for New Spraying Ops Drone Pilots
 - 3) Petitioner's T20 Drone Pilot Assessment
 - 4) Petitioner's Digital Spraying Log"

We have not received these documents. Petitioners who have been issued similar grants of exemption (see Exemption No. 18009) have provided a comprehensive training and certification program. Your operator's training program should be a comprehensive training course tailored for the proposed operations that includes theory and practical components, a pilot theory exam, and supervised operational familiarization training on agricultural spraying. Additionally, the training program requirements should include examination, flight test, and continued periodic training.

3. Please provide a comprehensive operational risk and safety manual containing a detailed risk analysis specific to your operation. Petitioners who have been issued similar grants of exemption (see Exemption No. 18009) have provided a comprehensive operational risk and safety manual. Your operational risk and safety manual should identify risks specific to your operation, provide procedures to mitigate those risks, and determine whether the residual risk level is acceptable.
4. Please provide the "various checklists" listed in your petition for exemption. In your petition for exemption you state, "The PIC and APIC will also have various checklists related to their (a) equipment, (b) arrival and setup at the operations location, (c) the before start inspection, (d) the before start "run-up" inspection, (e) the spraying

operations, (f) the after spraying flush of the T20, and (g) securing the T20 at the conclusion of the operation. The PIC and APIC will also maintain checklists relating to various abnormal and emergency scenarios such as a drone crash or fire, a battery charger fire, unknown person in ops area, and T20 controller issues.” If complete copies of these checklists are contained in the Operations and Procedures Manual referenced in 1. above, you may disregard this request.

Please submit the additional information (non-proprietary) as a comment to your docket at www.regulations.gov, and save the tracking number generated after submission. Proprietary information may be submitted electronically to David Reaves at david.reaves@faa.gov and Sean O’Tormey at sean.p.o'tormey@faa.gov.

If you want us to process your request any further, we must receive the information described above by October 15, 2021. If we do not receive the information, we will close the docket without notifying you further. If you have any questions or require additional time, you may email us or call (717) 473-0231. Thank you.

Sincerely yours,



David Reaves

Aviation Safety Inspector
Operations Group | AFS-830

Flight Standards Service
800 Independence Ave, SW
Washington, DC 20591
Text | Phone (717) 473-0231